

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF LOUISIANA  
SHREVEPORT DIVISION**

<b>TODD PHILLIPS, et al</b>	*	<b>CIVIL ACTION NO: 17-1524</b>
<b>VERSUS</b>	*	<b>DISTRICT JUDGE DOUGHTY</b>
<b>JULIAN WHITTINGTON, et al</b>	*	<b>MAGISTRATE JUDGE HORNSBY</b>

**NOTICE OF CROSS-APPEAL**

Notice is hereby given that the Plaintiffs, TODD PHILLIPS, JODI PHILLIPS, BROOKE PHILLIPS, and ABBY PHILLIPS, hereby appeal to the United States Court of Appeals for the Fifth Circuit from the trial court’s Memorandum Ruling and Judgment granting in part and denying in part BSO Defendants’ summary judgment motion asserting qualified immunity, which ruling was entered on October 28, 2020 (Rec. Docs. 180, 181), under the Court’s pendent appellate jurisdiction because the issues to be presented are “inextricably intertwined” with the appeal of Sheriff Julian Whittington and Lt. Bruce Bletz from the same Memorandum Ruling and Judgment, *see* Rec. Doc. 187, and review of the complete Memorandum Ruling and Judgment (Rec. Docs. 180, 181) “is necessary to ensure meaningful review.” *See Anderson v. Valdez*, 845 F.3d 580, 589 (5<sup>th</sup> Cir. 2016).

Respectfully submitted,

**STROUD, CARMOUCHE & BUCKLE, PLLC**

BY: /s/ Nichole M. Buckle  
Nichole M. Buckle, Bar No. 32113  
7330 Fern Avenue, Suite 903  
Shreveport, Louisiana 71105  
Phone: (318) 629-0014  
Fax: (318) 404-1571

**BREITHAUPT, DUBOS, & WOLLESON**

Michael L. DuBos, Bar No. 23944

1811 Tower Drive

Monroe, Louisiana 71201

Phone: (318) 322-1202

Fax: (318) 322-1984